

### REMARKS

Claims 2-3, 5, 6, 10, 11, 13-20, 22-25, 29-32, 35 and 38, 39 and 43-45 are pending in the application. Claims 2, 3, 11, 13-23, 30-38 and 44 were rejected under 35 U.S.C. § 103(a), as described on pages 2-10 of the Office Action. Claims 5, 6, 20, 24, 25 and 39 were rejected under 35 U.S.C. § 103(a), as described on pages 10-13 of the Office Action. Claims 1, 13, 22, 31, 35, 38 and 44 are the only independent claims.

In accordance with one aspect of the present invention, the URL specifying means is operable to specify at least one URL assigned to a second content, based on a table which associates: tag information embedded in a first content and indicating attributes related to the second content; at least one of location information and information concerning the user which are set in the terminal; and a URL indicating from where the second content is to be fetched. The location being set in the terminal is described in the specification, for example on page 18, lines 4-7. Further, information concerning the user, such as the user's sex, age, hobby and the like being set in the terminal is disclosed, for example on page 29, lines 13-16. Finally, the table which associates tag information, at least one of the location information and information concerning the user which are set in the terminal, and the URL indicating from the where the second content is to be fetched is described in the specification, for example on page 19, line 13 through page 20, line 4, and page 29, lines 3-16.

The above discussed features are recited in each of amended independent claims 13, 31 and 44, as described in more detail below.

Amended independent claim 13 recites, *inter alia*:

a table which associates: the tag information embedded in the received first content; at least one of location information and information concerning a user which are set in the terminal; and a URL indicating from where the second content is to be fetched, and to fetch the second content having the URL assigned thereto.

Amended independent claim 31 recites, *inter alia*:

table which associates: the tag information notified by the terminal; at least one of location information and the information concerning the user notified by the terminal; and a URL indicating from where the second content is to be fetched.

Amended independent claim 44 recites, *inter alia*:

a table which associates: the tag information; at least one of location information and information concerning a user which are set in the terminal; and a URL indicating from where the second content is to be fetched.

The prior art of record fails to disclose or suggest the above-identified limitations.

As discussed on page 3 of the Office Action, “Rangan does not disclose...the use of tag information.” As further described on page 3 of the Office Action, “Zigmond fails to disclose the use of tag information.” The Examiner therefore relies on the disclosure of Shoff.

Shoff describes distributing, together with image data, data representing a source (URL) from which to fetch a webpage to be downloaded and the timing with which to display the webpage.

However, as acknowledged on page 4 of the Office Action, “Rangan, Zigmond and Shoff do not disclose storing a user’s area, utilizing a table, which specifies URL of a CM matching a user’s regional area, the name of a sponsor or product or nationwide broadcast via satellite.” Accordingly, it is submitted that Shoff fails to disclose specifying a URL assigned to a second content, based on a table which associates tag information, at least one of location information and information concerning the user, and a URL indicating from where the second content is to be fetched.

In light of the above discussion, it is clear that neither Rangan, Zigmond and Shoff, either singly or combination, discloses or suggests a table as recited in each of amended independent claims 13, 31 and 44. Further, in light of the distinctions between amended independent claims 13, 31 and 44 and the combination of Rangan, Zigmond and Shoff, one of ordinary skill in the art at the time of the invention would not have been motivated to modify the combination of Rangan, Zigmond and Shoff to arrive at that which is recited in amended independent claims 13, 31 or 44.

Therefore claims 13, 31 and 44 in addition to claims 2, 3, 5, 6, 10, 11, 14-20, 32 and 45 are patentable over the combination of Rangan, Zigmond and Shoff.

Page 4 of the Office Action indicates that the Examiner “takes official notice that utilizing a table to define a target area for commercial messages based upon a zipcode and associating a message with a sponsor or product is well known in the art.” Applicants traverse

such a finding because, as stated on page 2, lines 1-5 of the present application, programs that are conventionally broadcast nationwide directly from a key station via a satellite digital broadcasting network can include CMs inserted by the key stations but cannot include CMs inserted by the local stations. Because the conventionally broadcasts did not include CMs inserted by the local stations, it was not well known to utilize a table to define a targetted area for commercial messages. Therefore, it was not well known to utilize a table to define a targetted area for commercial messages based on a zipcode and associating a message with a sponsor, as asserted by the Examiner.

In the event that the official notice is maintained, Applicants respectfully request that the Examiner provide documentary evidence to support such a position.

In accordance with another aspect of the present invention, a URL inquiry means notifies a server provided on the network of the tag information embedded in the first content and of at least one of location information and information concerning a user which are set in the terminal, and inquires about at least one URL assigned to the second content. This featurer is recited in amended claim 22, as discussed in more detail below.

Amended claim 22 recites, *inter alia*:

URL inquiry means which notifies a server provided on the network of the tag information embedded in the first content and of at least one of location information and information concerning a user which are set in the terminal, and inquires about at least one URL assigned to the second content.

The prior art of record fails to disclose or suggest the above-identified limitations.

As discussed on page 7 of the Office Action, "Rangan does not disclose...the use of tag information." As further discussed on page 7 of the Office Action, "Zigmond fails to disclose utilizing tags." The Examiner therefore relies on the disclosure of Shoff.

Shoff describes distributing, together with image data, data representing a source (URL) from which to fetch a webpage to be downloaded and a timing with which to display the webpage. However, Shoff fails to disclose or suggest notifying a server of tag information. Thus Shoff fails to disclose or suggest notifying a server of tag information and of at least one of location information and information concerning the user, and inquiring about the URL assigned to a second content, as recited in amended independent claim 22.

In light of the above discussion, it is clear that neither Rangan, Zigmond nor Shoff disclose or suggest a URL inquiry means which notifies a server provided on a network of the tag information embedded in the first content and at least one of location information and information concerning a user which are set in the terminal, and inquires about at least one URL assigned to the second content, as recited in amended independent claim 22. Therefore, a combination of the disclosures of Rangan, Zigmond and Shoff additionally fails to disclose or suggest that which is recited in amended independent claim 22. Further, in light of the distinctions between amended independent claim 22 and the combination of Rangan, Zigmond and Shoff, one of ordinary skill in the art at the time of the invention would not have been motivated to modify the combination of Rangan, Zigmond and Shoff to arrive at that which is recited in amended independent claim 22.

Accordingly, amended independent claim 22 in addition to claims 23-25, 29 and 30 are patentable over a combination of the disclosures of Rangan, Zigmond and Shoff.

In accordance with another aspect of the present invention, a table for specifying a second content is embedded in the first content, and a URL related to a second content for use in the area of the terminal is specified based on the table embedded in the first content and at least one of location information and information concerning a user which is set in the terminal. This feature is recited in amended claim 35, as discussed in more detail below.

Amended claim 35 recites, *inter alia*, that “first content is embedded with a table for specifying the second content” and:

wherein said fetch means refers to the table embedded in the first content and at least one of the location information and information concerning a user which is set in the terminal to specify a URL related to a second content for use in the area of the terminal.

The prior art of record fails to disclose or suggest the above-identified limitation.

Similar to the arguments presented above with respect to amended independent claims 13, 31 and 44, it is submitted that neither Rangan, Zigmond nor Shoff, either singly or in combination, discloses or suggests a first content that is embedded with a table for specifying the second content.

Further, it is submitted that neither Rangan, Zigmond nor Shoff, either singly or in combination, discloses or suggests a fetch means that refers to the table and at least one of the location information and information concerning a user to specify a URL related to a second content.

Accordingly, a combination of Rangan, Zigmond and Shoff fails to disclose or suggest that which is recited in amended independent claim 35. Furthermore, in light of the distinctions between amended independent claim 35 and the combination of Rangan, Zigmond and Shoff, one of ordinary skill in the art at the time of the invention would not have been motivated to modify the combination of Rangan, Zigmond and Shoff to arrive at that which is recited in amended independent claim 35.

In accordance with another aspect of the present invention, a table for specifying a second content is embedded in the first content, and a URL of the second content is specified based on the table embedded in the first content and at least one of location information and information concerning a user which are set in the terminal to specify a URL of the second content. This aspect is recited in amended claim 38 as discussed in more detail below.

Amended claim 38 recites, *inter alia*, that “the first content is embedded with a table for specifying the second content” and:

wherein said fetch means refers to the table embedded in the first content received by said reception means and at least one of location information and information concerning a user which are set in the terminal to specify a URL of the second content and fetches the second content having the URL assigned thereto, and

wherein said reproduction and output means extracts the key information from the second content fetched by said fetch means, descrambles the first content by the key information and interrelates the first and second contents with each other for reproduction and output.

The prior art of record fails to disclose or suggest the above-identified limitations.

Similar to the arguments presented above with respect to amended independent claims 13, 31, 44 and 35 it is submitted that neither Rangan, Zigmond nor Shoff, either singly or in combination, discloses or suggests a first content that is embedded with a table for specifying the second content or a fetch means that refers to the table and at least one of the location

information and information concerning a user to specify a URL related to a second content. Moreover, neither Rangan, Zigmond nor Shoff, either singly or in combination, discloses or suggests extracting key information for the second content to descramble the first content.

Accordingly, a combination of Rangan, Zigmond and Shoff fails to disclose or suggest that which is recited in amended independent claim 38. Further, in light of the distinctions between amended independent claim 38 and the combination of Rangan, Zigmond and Shoff, one of ordinary skill in the art at the time of the invention would not have been motivated to modify the combination of Rangan, Zigmond and Shoff to arrive at that which is recited in amended independent claim 38.

Thus amended independent claim 38 and claims 39 and 43 are patentable over a combination of Rangan, Zigmond and Shoff.

It is submitted that neither Kato or Saito discloses or suggests the shortcomings of the combination of Rangan, Zigmond and Shoff, such that a combination of Rangan, Zigmond, Shoff, Kato and Saito would disclose or suggest that which is recited in amended independent claims 13, 22, 31, 35, 38 or 44.

As discussed in page 10 of the Office Action, Saito is relied upon for disclosing a program viewing system in which the decoded data may be transmitted over a second interface. As discussed in page 12 of the Office Action, Kato is relied upon for a disclosure of a conceptual diagram of an MPEG video stream. Further, as discussed in page 13 of the Office Action, Kato is relied upon for a disclosure of the use of a watermark-embedding unit 25, which embeds a key, within a watermark stored within MPEG audio data.

While not addressing whether the assertions of the disclosures of Saito and Kato, as discussed above, are accurate, it is respectfully submitted the neither one of Saito or Kato disclose or suggest: that the terminal is further operable to specify any one URL based on a table which associates the tag information embedded in the received first content, at least one of location information and information concerning a user which are set in the terminal, and a URL indicating from where the second content is to be fetched, and to fetch the second content having the URL assigned thereto, as recited in amended independent claim 13; a URL inquiry means which notifies a server provided on the network of the tag information embedded in the first content and of at least one of location information and information concerning a user which are

set in the terminal, and inquires about at least one URL assigned to the second content to be interrelated with the first content for reproduction and output, as recited in amended independent claim 22; a URL specifying means for specifying at least one URL assigned to the second content to be interrelated with the first content for reproduction and output based on a table which associates the tag information notified by the terminal, at least one of location information and the information concerning the user notified by the terminal, and a URL indicating from where the second content is to be fetched, as recited in amended independent claim 31; a fetch means that refers to the table embedded in the first content and at least one of the location information and information concerning a user which is set in the terminal to specify a URL related to a second content for use in the area of the terminal and fetches the second content based on the specified URL, as recited in amended independent claim 35; a fetch means that refers to the table embedded in the first content received by the reception means and at least one of location information and information concerning a user which are set in the terminal to specify a URL of the second content and fetches the second content having the URL assigned thereto, as recited in amended independent claim 38; or a URL specifying means for specifying at least one URL assigned to the second content to be interrelated with the first content for reproduction and output based on a table which associates the tag information, at least one of location information and information concerning a user which are set in the terminal, and a URL indicating from where the second content is to be fetched, as recited in amended independent claim 44.

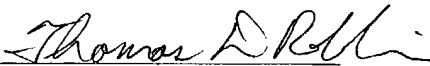
In light of the above discussion, it is clear that claims 2-3, 5, 6, 10, 11, 13-20, 22-25, 29-32, 35 and 38, 39 and 43-45 are patentable over the prior art of record.

Having fully and completely responded to the Office Action, Applicants submit that all of the claims are now in condition for allowance, an indication of which is respectfully solicited.

If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below.

Respectfully submitted,

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